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September 14, 2020

BY ECF

The Honorable Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Craig Franklin v. Stephen Waters et al.*,
SDNY Case No. 16 Civ. 9819 (AHK)

Dear Judge Hellerstein:

We represent Plaintiff Craig Franklin and write on behalf of all parties. Since the prior Court conference on June 26, 2020, the parties have engaged in substantial settlement discussions. The parties mutually agree that a mediator may help further those discussions by remote means.

In August 2018, the Court referred this matter to Judge Ona Wang for a mediation. (Dkt. No. 129). Given the change in circumstances since that time, the parties believe such discussions will be more productive at this time. Thus, the parties jointly request that the Court issue a new order referring the case back to Judge Wang or to another magistrate judge.

If the Court is inclined to refer the case for settlement purposes, the parties also jointly request that the Court conference currently scheduled for September 18, 2020 be adjourned for approximately 60 days while the parties engage in such facilitated settlement discussions.

Respectfully submitted,
RASCO KLOCK PEREZ & NIETO, LLC

By: James W. Halter
James Halter

cc: Counsel of Record (by ECF)